REMARKS

Applicants respectfully request further examination and reconsideration
in view of the instant response. Claims 1-6, 10-19, and 21-25 remain pending
in the case. Claims 1-6, 10-19, and 21-25 are rejected. Claims 1, 10 and 19
are amended herein. No new matter has been added.

35 U.S.C. §103(a)

Claims 1-6, 10-19 and 22-25 are rejected under 35 U.S.C. § 103(a) as
being unpatentable over United States Patent Application Publication
2002/0087680 A1 by Cerami et al., hereinafter referred to as the "Cerami"
reference, in view of United States Patent 6,606,744 by Mikurak, hereinafter
referred to as the "Mikurak" reference. Applicants have reviewed the cited
reference and respectfully submit that the present invention as recited in
Claims 1-6, 10-19 and 22-25 is not anticipated nor rendered obvious by
Cerami in view of Mikurak.

Applicants respectfully direct the Examiner to independent Claim 1 that
recites that an embodiment of the present invention is directed to (emphasis
added):

> A method of addressing problems associated with
> customer orders, comprising the steps of:
> receiving an order placed by a customer;
> initiating a workflow process to handle the order;
> monitoring the workflow process to detect any problems
> related to the order;

> notifying a human call center agent if a problem occurs during the processing of the order which enables the human call center agent to proactively contact the customer; and
> proactively establishing a telephonic interaction between said human call center agent and the customer in response to the problem to resolve the problem.

Independent Claims 10, 16 and 22 recite similar limitations. Claims 2-6 that depend from independent Claim 1, Claims 11-15 that depend from independent Claim 10, Claims 17-19 that depend from independent Claim 16, and Claims 23-25 that depend from independent Claim 22 provide further recitations of the features of the present invention.

The combination of Cerami and Mikurak does not teach a method of addressing problems associated with customer orders, as claimed. For instance, Cerami and these embodiments of the claimed invention are very different. Applicants understand Cerami to teach a method for managing a repair process for a fault between a proactive network repair system and a customer service system using a repair ticketing system. In particular, Cerami relates to broadband network management.

Applicants understand Cerami to teach a system for proactively managing faults in a broadband network. Specifically, the system of Cerami monitors a network and manages faults of the network. Cerami does not teach, describe or suggest a system for taking customer orders or for dealing with business transaction. In contrast, Cerami teach a system for managing a

repair process in a broadband network. With reference to Figure 3 of Cerami, proactive network management system 300 detects faults in the network and attempts to resolve the faults ([0042]). In particular, Applicants respectfully assert that these network faults are not related to actions of a particular customer, but rather are related to hardware and software problems of the network ([0072] through [0079]). Moreover, trouble ticketing system 308 is operable to provide status information such that a customer can be appraised of the status of a problem ([0046]). However, the problem resolution does not require customer input.

In contrast, embodiments of the claimed invention are directed towards a method of addressing problems associated with customer orders including proactively establishing a telephonic interaction between said human call center agent and the customer in response to the problem to resolve the problem. As described in the present application, if a transaction fails, a call center is notified for allowing a call center representative to proactively contact the customer "to explain the situation and propose a solution or some other viable solution" (page 9, lines 5-20). As recited in the claimed embodiments, the telephonic interaction between the call center agent and the customer is for resolving the problem.

Furthermore, Applicants respectfully assert that the proactive network management system of Cerami is not the workflow as claimed in the present

invention. Cerami teaches a system for proactively managing faults in a broadband network. Specifically, the system of Cerami monitors a network and manages faults of the network. Cerami does not teach, describe or suggest a system for taking customer orders or for dealing with business transaction.

In contrast, embodiments of the claimed invention are directed towards a method of addressing problems associated with customer orders including monitoring the workflow process to detect any problems related to the order. Specifically, with reference to Figure 3 of the present application, if a failure is detected in the workflow while processing the order at step 304, a call center is notified at step 305. The workflow is monitored for problems related to the order.

Applicants understand Cerami to teach a method or managing a repair process for a fault between a proactive network repair system and a customer service system using a repair ticketing system. In particular, the ticketing system notifies customer service representatives about a fault in the network so that the customer service representatives can "report known fault problems and repair efforts to customers when they call in" (emphasis added). Applicants respectfully assert that the method taught by Cerami is reactive, rather than proactive, as the customer service representative reacts to a customer's call before reporting information to the customer.

Furthermore, Applicants respectfully submit that there is no motivation to proactively contact customers in Cerami, because customer input is not required to resolve the faults of the broadband network. Fault detection in a network is much different than monitoring a problem related to an order. The number of users affected by a network fault can be very large, and proactively notifying the users is unnecessary. In many circumstances, it would not be feasible for a network manager to call affected users. For instance, since the problem is related directly to the network, calling the user would have no positive effect on the repair process, but would rather allocate resources away from network repair.

In contrast, embodiments of the present invention are directed towards proactively establishing a telephone interaction between a human call center agent and a customer in response to a problem related to the order to resolve the problem. That the problem is related to the order is very different from the fault detection of Cerami. For instance, the problem related to the order may require customer contact in order to solve the problem (e.g., page 9, lines 5-20). For example, the exact product ordered may not be available, but a similar product is. By contacting the customer associated with the order, the problem can be solved. Applicants respectfully assert that Cerami does not teach, disclose, or suggest monitoring the workflow process to detect any problems related to the order and proactively establishing a telephonic interaction

between a human call center agent and a customer in response to the problem to resolve the problem, as claimed.

Cerami does not teach, disclose, or suggest monitoring the workflow process to detect any problems related to the order or to proactively establish a telephonic interaction between the call center agent and the customer to solve the problem, as claimed. On the contrary, Cerami teaches a system for proactive fault detection in a network. Specifically, Cerami teaches away from such a configuration, as Cerami provides fault information for a network that is unfeasible, unnecessary and costly to proactively provide to a customer.

Moreover, the combination of Cerami and Mikurak fails to teach or suggest the present invention as claimed because Mikurak does not overcome the shortcomings of Cerami. Mikurak, alone or in combination with Cerami, does not show or suggest a method of addressing problems associated with customer orders, as claimed. Applicants understand Mikurak to teach a system for providing for collaborative installation management in a network-based supply chain environment.

Applicants understand Mikurak to teach a system in which a customer may be notified regarding upgrades and other software related information, such as problems and suggested solutions (col. 163, lines 28-41). In particular, a customer does not place an order. Mikurak does not teach,

describe or suggest a system that receives an order placed by a customer. Moreover, the automatic notification of Mikurak is not made in response to a problem with an order.

In contrast, embodiments of the claimed invention are directed towards a method of addressing problems associated with customer orders including receiving an order placed by a customer and initiating a workflow process to handle the order. As described in the present specification, an order is placed at step 301 of Figure 3. In particular, an order is made by purchasing a product in exchange for a payment (page 14, lines 14-25).

Furthermore, Applicants respectfully assert that the system for providing for collaborative installation management of Mikurak is not the workflow as claimed in the present invention. Mikurak teaches a system for notifying customers about upgrades and other software related information, such as problems and suggested solutions. Specifically, the system of Mikurak provides proactive customer support. Mikurak does not teach, describe or suggest a system for taking customer orders or for dealing with business transactions. Furthermore, Mikurak does not teach, describe or suggest proactively establishing a telephonic interaction between a human call center agent and a customer in response to a problem to resolve the problem.

In contrast, embodiments of the claimed invention are directed towards a method of addressing problems associated with customer orders including monitoring the workflow process to detect any problems related to the order. Specifically, with reference to Figure 3 of the present application, if a failure is detected in the workflow while processing the order at step 304, a call center is notified at step 305. The workflow is monitored for problems related to the order.

Furthermore, Applicants respectfully submit that there is no motivation to combine the teachings of Cerami and Mikurak. In particular, there is no motivation taught in Cerami to proactively contact customers, because customer input is not required to resolve the faults of the broadband network. Fault detection in a network is much different than monitoring a problem related to an order. The number of users affected by a network fault can be very large, and proactively notifying the users is unnecessary. In many circumstances, it would not be feasible for a network manager to call affected users. For instance, since the problem is related directly to the network, calling the user would have no positive effect on the repair process, but would rather allocate resources away from network repair. Accordingly, Cerami teaches away from such combination with Mikurak, since Mikurak teaches proactive customer service.

Mikurak does not teach, disclose, or suggest monitoring the workflow process to detect any problems related to the order, as claimed. In view of the claim limitations of receiving an order placed by a customer, monitoring the workflow process to detect any problems related to the order and proactively establishing a telephonic interaction between a human call center agent and a customer in response to the problem to resolve the problem, not being shown or suggested in Mikurak, in combination with the above arguments, Applicants respectfully submit that independent Claims 1, 10, 16 and 22 overcome the cited references and are therefore allowable over the combination of Cerami and Mikurak.

Applicants respectfully assert that nowhere does the combination of Cerami and Mikurak teach, disclose or suggest the present invention as recited in independent Claims 1, 10, 16 and 22, and that these claims are thus in condition for allowance. Therefore, Applicants respectfully submit the combination of Cerami and Mikurak also does not teach or suggest the additional claimed features of the present invention as recited in Claims 2-6 dependant on allowable base Claim 1, Claims 11-15 dependant on allowable base Claim 10, Claims 17-19 dependant on allowable base Claim 16, and Claims 23-25 dependant on allowable base Claim 22. Applicants respectfully submit that Claims 2-6, 11-15, 17-19 and 23-25 overcome the rejection under 35 U.S.C. § 103(a) as these claims are dependent on allowable base claims.

CONCLUSION

Based on the arguments presented above, Applicants respectfully

assert that Claims 1-6, 10-19 and 22-25 overcome the rejections of record and,

therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned

representative if the Examiner believes such action would expedite resolution

of the present Application.

Respectfully submitted,
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